

January 11, 1999

Ms. Char Hauger  
U.S. Army Corps of Engineers  
190 Fifth Street East  
St. Paul, MN 55101-1638

RE: HSPF Modeling by EPA: Crandon Mine Project: 94-01298-IP-DLB

Dear Ms. Hauger:

As a follow-up to our joint U.S. Army Corps of Engineers (COE)/U.S. Environmental Protection Agency (EPA) presentation held on December 8 and 9, 1998 in Rhinelander, Wisconsin, I wish to thank you for giving EPA the opportunity to update all the parties on the progress related to the HSPF Surface Water/Hydrology and Hydraulic Model. Many good suggestions on how to improve the model were generated through the open discussions with the parties present at the meeting. It is anticipated that the HSPF model will supply information to assist with the evaluation of the impacts of the mine on surface water, biological and tribal trust resources.

Of concern at this meeting, however, was the COE's statement regarding the overall schedule of the federal Environmental Impact Statement (EIS) and the incorporation of the results of the HSPF model into the EIS. The COE made it clear that the federal EIS process was not going to wait for the HSPF model to be completed prior to drafting or finalizing the federal EIS. We do, however, appreciate your stated willingness to utilize whatever portions of the HSPF model are available at the time of the EIS drafting, but we feel this falls short of the support that the COE had given the model in the beginning of the project, as was stated in Colonel Wonsik's letter to EPA's Acting Regional Administrator, David Ullrich on June 18, 1997. In that letter, Colonel Wonsik stated that "... the entire hydrologic cycle and, to the extent practicable, potential quantitative changes to surface waters should be considered in evaluating CMC's proposed project. The Corps therefore supports EPA's development of the model for the 3-mile radius high resolution area." The use of the HSPF model has also been supported by the Great Lakes Indian Fish and Wildlife Commission, and the Tribes for use on this project. I do hope that the COE continues with its support of the model and waits for its completion prior to issuing a final federal EIS.

Hopefully, any significant delays with the completing of the HSPF model can be avoided and this matter will not be of issue. While I can certainly empathize with your desire to get the EIS done in as much of a timely manner as possible, and even though EPA's HSPF model has had several delays, as have the other models that have been part of this project, I assure you that EPA is working as quickly as possible and has every intention of completing the model so that its results can be incorporated into the federal EIS.

We hope that the COE will continue to support the need to include the results of the HSPF model in the federal EIS and is willing to wait, within reason, for its completion. Please let me know what your overall EIS schedule is with regard to when outside information is needed for you to be able to incorporate it into the federal EIS. Regardless if we finish the model in time to be included in the federal EIS or not, EPA is committed to complete the model and will forward all results to you when available. When we have a firm schedule established, we will share this with you. In the meantime, we will continue to keep you informed of the progress of the HSPF model through our periodic HSPF update conference calls.

Thank you for your attention to this matter. If you have any questions regarding any of the above, please do not hesitate to call me at (312) 886-7252.

Sincerely,

Daniel J. Cozza, Crandon Mine Project Manager  
U.S. Environmental Protection Agency

cc:

J. Stewart, USGS  
B. Tans , WDNR  
J. Coleman, GLIFWC  
G. Reid, NMC  
D. Anderson, Mole Lake  
D. Cox, Menominee  
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